

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEM YIELD BAHAMAS LIMITED and GEM
GLOBAL YIELD LLC SCS,

Petitioners,

vs.

MULLEN TECHNOLOGIES, INC. and MULLEN
AUTOMOTIVE, INC.,

Respondents.

Case No. 1:24-cv-01120-KPF

**NOTICE OF APPLICATION TO CONFIRM AND ENTER JUDGMENT ON
PARTIAL FINAL AWARD**

PLEASE TAKE NOTICE that, upon the annexed Application to Confirm and Enter Judgment on Partial Final Award, dated February 23, 2024 (the “PFA Application”), the Declaration of Jonathan Patchen and exhibits attached thereto, and the accompanying Petitioners’ Memorandum of Law in Support of Application to Confirm and Enter Judgment on Partial Final Award, Petitioners GEM Yield Bahamas Limited and GEM Global Yield LLC SCS (“Petitioners”), by their undersigned attorneys, will petition this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, pursuant to Section 9 and 207 of the Federal Arbitration Act (9 U.S.C. §§ 9, 207), for an Order (i) confirming, under the Court’s primary jurisdiction, a partial final nondomestic arbitration award issued on November 17, 2023 (the “Partial Final Award”) by the arbitrator in an arbitration proceeding between Petitioners and Respondents Mullen Technologies, Inc. and Mullen Automotive, Inc. (“Respondents”), entitled *GEM Yield Bahamas Limited and GEM Global Yield LLC SCS v. Mullen Technologies, Inc. and Mullen*

Automotive, Inc., AAA Case No. 01-21-0016-7001; (ii) directing that judgment be entered upon the Partial Final Award, and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Respondents' deadline to respond to the PFA Application is as set forth in Local Civil Rule 6.1(b) of the Local Rules of the United States District Courts for the Southern and Eastern District of New York (the "Local Rules"), and that a hearing, if any, will be set as provided by Local Civil Rule 6.1(c) of the Local Rules.

PLEASE TAKE FURTHER NOTICE that failure to timely appear and defend may result in a judgment of default against Respondents for relief demanded by Petitioners.

Dated: February 23, 2024

WILLKIE FARR & GALLAGHER LLP

/s/ Jonathan A. Patchen

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Attorneys for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2024, I caused the foregoing Notice of Application to Confirm and Enter Judgment on Partial Final Award to be served on the following counsel for Respondents via email. The following counsel have confirmed that they represent Respondents in this action and provided written consent to electronic service via email.

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/s/ Jonathan A. Patchen

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